

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

SCOTT K. SULLIVAN, et al.,	§	CAUSE NO. 4-20-cv-02236
	§	
Plaintiffs,	§	
	§	<i>Consolidated with:</i>
vs.	§	
	§	CAUSE NO. 4-21-cv-00658
STEWART A. FELDMAN, et al.,	§	&
	§	CAUSE NO. 4-21-cv-00682
Defendants.	§	

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UNOPPOSED MOTION TO WITHDRAW AS COUNSEL

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Ahmad, Zavitsanos & Mensing P.C. (“AZA”) (f/k/a Ahmad, Zavitsanos, Anaipakos, Alavi & Mensing P.C.) and its attorneys, including Sammy Ford IV, Shawn Bates, and Ian Marshall Sander, respectfully move for an order recognizing the withdrawal of AZA, including attorneys Ford, Bates, Sander, as attorneys of record for PoolRe Insurance Corporation (“PoolRe”) and its directors Stephen Friedman, Robert Snyder, and Dana Moore (collectively, the “Directors”).<sup>1</sup> In support of this motion, AZA shows as follows:

1. An attorney may withdraw from representation upon “a showing of good cause and reasonable notice to the client.” *Matter of Wynn*, 889 F.2d 644, 646 (5th Cir. 1989).

Withdrawal of counsel “may be effected by motion and order.” S.D. Tex. L.R. 83.2.

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<sup>1</sup> AZA files this Unopposed Motion in Cause No. 4-20-cv-02236, under which Cause Nos. 4-21-cv-00658 and 4-21-cv-00682 have been consolidated. AZA has never appeared in Cause No. 4-20-cv-02236 proper, nor were PoolRe or the Directors named parties in that specific matter. AZA has appeared on behalf of PoolRe in Cause No. 4-21-cv-00658 and Cause No. 4-21-cv-00682 and on behalf of the Directors in Cause. No. 4-21-cv-00658; it is those appearances and representations from which AZA now moves to withdraw.

2. Good cause exists for AZA and its attorneys to withdraw. AZA is no longer counsel to PoolRe or the Directors. Further, PoolRe and the Directors do not oppose and consent to the withdrawal.
3. AZA has provided PoolRe and the Directors with notice of its withdrawal, and PoolRe and the Directors have previously been aware of AZA's potential withdrawal. PoolRe and the Directors have also received, reviewed, and approved the substance of this motion.
4. AZA's withdrawal will cause no delays in this case. *See* S.D. Tex. L.R. 83.2 ("no delay will be countenanced because of a change in counsel . . ."). There is no trial date set. And this action is currently stayed. Although a motion to lift the stay and confirm an arbitration award has been filed in a consolidated case, that motion facially does not seek relief against PoolRe or the Directors.
5. PoolRe's and the Director's current contact information is as follows; however, it is understood that PoolRe is in the process of obtaining new counsel:

PoolRe: *Via* PoolRe's registered agent, Dana D. Moore, at 3046 N. Heald St., Wilmington, DE 19802.

Directors: *Via* PoolRe's registered agent.

6. PoolRe and the Directors will not be prejudiced by AZA's withdrawal at this juncture.

### **CONCLUSION**

For the reasons stated above, AZA respectfully requests that the Court enter an Order withdrawing AZA, including its attorneys Sammy Ford IV, Shawn Bates, Ian Marshall Sander, and all other AZA attorneys, as counsel for PoolRe and the Directors and

terminating electronic notices to Messrs. Ford, Bates, Sander, and all other AZA attorneys in the above-captioned matter(s).

Respectfully submitted,

**AZA LAW**

/s/ Sammy Ford IV

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**Certificate of Service**

On April 27, 2022, the foregoing instrument was served to all counsel of record via the Court's electronic filing and notice system.

/s/ Sammy Ford IV

Sammy Ford IV